Remarks/Arguments:

Reconsideration of the application is requested.

Claims 1-14 remain in the application. Claims 1, 12, 13, and 14 have been amended so as to correct a misspelling of the word holding. No new matter has been added.

In the second paragraph on page 2 of the Office action, claims 1, 2, 5-8, 12, 13, and 14 have been rejected as being fully anticipated by Vrotacoe et al. (U.S. Patent No. 5,535,674) (hereinafter "Vrotacoe") under 35 U.S.C. § 102.

As will be explained below, it is believed that the claims were patentable over the cited art in their original form and the claims have, therefore, not been amended to overcome the references.

Before discussing the prior art in detail, it is believed that a brief review of the invention as claimed, would be helpful.

Claims 1, 12, 13, and 14 call for, *inter alia*:

an exposure drum for holding the recording material and having an axis; and

at least one rotary lead-through fluidically communicating with and through which a temperature-controlled liquid flows into the internal pipe.

It is noted that the corporate assignee of the Vrotacoe reference is also the assignee of the instant application. Therefore, applicant is very familiar with the Vrotacoe reference.

The Vrotacoe reference discloses a printing unit cylinder in an offset printing press, which can be used either as a printing cylinder or as a transfer cylinder (column 2, lines 61-67). No recording material, such as a printing plate, is exposed (imaged) in the printing press. The fluid contained within the printing cylinder does not serve to control the temperature of the material mounted on the cylinder (i.e. either a printing plate ready for printing or a transfer blanket), but instead the fluid serves to prevent bending of the printing unit cylinder due to an uneven distribution of temperature in the cylinder. Vrotacoe explicitly discloses that the absolute temperature level is of less importance and that the object of his invention is to evenly distribute a non-uniform heat input (column 1, line 50 to column 2, line 4). In one embodiment Vrotacoe discloses that the liquid is

filled into the cylinder and then the inlets (21) are closed by plugs (14) (column 4, lines 3-5 and Fig. 3). In another embodiment, Vrotacoe discloses that the liquid is circulated by a circulation system (100) outside the cylinder or by a pump (101) inside the cylinder (column 5, lines 27-33; Figs. 4b and 4c). Vrotacoe does not disclose that the liquid is temperature-controlled.

The reference does not show an exposure drum for holding the recording material and having an axis, as recited in claims 1, 12, 13, and 14 of the instant application. The Vrotacoe reference discloses a printing unit cylinder in an offset printing press, which can be used either as printing cylinder or as a transfer cylinder. Vrotacoe does not disclose an exposure drum for holding a recording material. This is contrary to the invention of the instant application as claimed, in which an exposure drum holds the recording material.

Furthermore, the reference does not show at least one rotary lead-through fluidically communicating with and through which a temperature-controlled liquid flows into the internal pipe, as recited in claims 1, 12, 13, and 14 of the instant application. The Vrotacoe reference discloses that the liquid in the cylinder is either filled into the cylinder and the

cylinder is plugged or that a circulation system circulates the liquid. Vrotacoe explicitly discloses that the absolute temperature level is of less importance and that the object of his invention is to evenly distribute a non-uniform heat input. Vrotacoe **does not** disclose a **temperature controlled** liquid flowing through an internal pipe of an exposure drum. This is contrary to the invention of the instant application as claimed, in which at least one rotary lead-through, which fluidically communicates with and through which a **temperature-controlled** liquid flows into the internal pipe.

Since claim 1 is believed to be allowable, dependent claims 2, 5-8, and 12 are believed to be allowable as well.

Even though claim 5 is believed to be allowable, the following remarks pertain to claim 5.

With respect to claim 5, Vrotacoe does not disclose a rotary lead-through for the liquid at a first end of the cylinder and a further rotary lead-through at a second end. What is disclosed and shown in Fig. 2 of Vrotacoe is an inlet (7) for gas and a bore (13) for applying gas pressure to the printing unit cylinder for blanket removal or for plate removal (column 3, lines 40-65). In Vrotacoe the gas pressure system for

plate removal is completely independent from the liquid system for heat distribution.

In the third paragraph on page 4 of the Office action, claims 3, 4, and 9 have been rejected as being obvious over by Vrotacoe (U.S. Patent No.5,535,674) in view of Feller et al. (U.S. Patent No. 6,065,402) (hereinafter "Feller") under 35 U.S.C. § 103. Feller does not make up for the deficiencies of Vrotacoe. Since claim 1 is believed to be allowable, dependent claims 3, 4, and 9 are believed to be allowable as well.

Even though claims 3, 4, and 9 are believed to be allowable, the following remarks pertain to claims 3, 4, and 9. With respect to claims 3, 4, and 9, Feller does not teach a thermally conductive material and does not explain how the internal pipe and the webs are fabricated. Feller is silent about extruded parts.

In the third paragraph on page 5 of the Office action, claim 10 has been rejected as being obvious over Vrotacoe (U.S. Patent No.5,535,674) in view of Feller (U.S. Patent No. 6,065,402) and further in view of Marmin et al. (U.S. Patent No. 5,967,036) (hereinafter "Marmin") under 35 U.S.C. § 103. Marmin does not make up for the deficiencies of Vrotacoe and

Feller. Since claim 1 is believed to be allowable, dependent claim 10 is believed to be allowable as well.

In the last paragraph on page 5 of the Office action, claim 11 has been rejected as being obvious over Vrotacoe (U.S. Patent No.5,535,674) in view of Kurosawa (U.S. Patent No. 5,074,213) under 35 U.S.C. § 103. Kurosawa does not make up for the deficiencies of Vrotacoe. Since claim 1 is believed to be allowable, dependent claim 10 is believed to be allowable as well.

It is accordingly believed to be clear that none of the references, whether taken alone or in any combination, either show or suggest the features of claims 1, 12, 13, or 14. Claims 1, 12, 13, and 14 are, therefore, believed to be patentable over the art and since all of the dependent claims are ultimately dependent on claim 1, they are believed to be patentable as well.

In view of the foregoing, reconsideration and allowance of claims 1-14 are solicited.

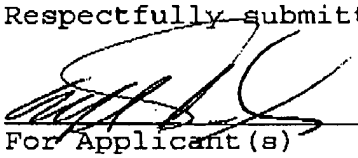
In the event the Examiner should still find any of the claims to be unpatentable, counsel respectfully requests a telephone

call so that, if possible, patentable language can be worked out.

If an extension of time for this paper is required, petition for extension is herewith made.

Please charge any other fees which might be due with respect to Sections 1.16 and 1.17 to the Deposit Account of Lerner & Greenberg P.A., No. 12-1099.

Respectfully submitted,



For Applicant(s)

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